

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ
RICHARD F. ALBERT
ROBERT J. ANELLO*
KATHLEEN E. CASSIDY
BENJAMIN S. FISCHER
CATHERINE M. FOTI
CHRISTOPHER B. HARWOOD
LAWRENCE IASON
BRIAN A. JACOBS
TELEMACHUS P. KASULIS
KAREN R. KING
THOMAS A. MCKAY
ROBERT M. RADICK*
JONATHAN S. SACK**
EDWARD M. SPIRO
JEREMY H. TEMKIN
RICHARD D. WEINBERG

565 FIFTH AVENUE
NEW YORK, NEW YORK 10017
(212) 856-9600
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

kcassidy@maglaw.com
212-880-9413

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COUNSEL
JOSHUA BUSSEN
PIPPA HYDE***
RETIRED/PARTNER EMERITUS
PAUL R. GRAND

ROBERT G. MORVILLO
1938-2011
MICHAEL C. SILBERBERG
1940-2002
JOHN J. TIGUE, JR.
1939-2009

*ALSO ADMITTED IN WASHINGTON, D.C.

**ALSO ADMITTED IN CONNECTICUT

***ALSO ADMITTED IN ENGLAND AND WALES

VIA EMAIL AND ECF (with redactions)

The Honorable Victor Marrero
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007-1312

USDC SDNY
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Re: United States v. Rodriguez and Lopez, Case No. 1:24-cr-00111-VM

Dear Judge Marrero:

We represent Julian Lopez in the above-captioned matter. We write to respectfully request that Mr. Lopez's bail conditions be modified from home detention with electronic monitoring to a curfew with electronic monitoring. We request that Mr. Lopez be permitted to leave his apartment from 8 am until 8 pm daily unless a different schedule is agreed to by his Pretrial Officer.

Pretrial Services has no objection to this modification, and the government takes no position.

Mr. Lopez has been on pretrial release subject to a condition of home incarceration or home detention since February 22, 2024. In August and September 2024, Mr. Lopez successfully maintained employment in a temporary position at the US Open, working shifts of 10 to 11 hours a day every day for nearly four weeks. Being able to leave his home for employment had a significant positive impact on Mr. Lopez's mental health and well-being. Since the employment ended, Mr. Lopez has been confined to his apartment, and has only left twice for approved medical visits during the past two weeks.

[REDACTED]

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[REDACTED]
[REDACTED] We are requesting to modify Mr. Lopez's conditions of release to a curfew in order to enable Mr. Lopez [REDACTED] and to pursue opportunities for employment, some of which he needs to apply for in person or may need to be available to conduct an interview on short notice. In addition, Mr. Lopez's mental state will benefit significantly from being able to go outside to run errands, get groceries or meals, or simply walk around the block for exercise.

As noted above, we have consulted with Pretrial Services and the United States regarding this requested change to Mr. Lopez's bail conditions, and Pretrial Services has no objection. The United States takes no position.

Respectfully submitted,
/s/ Kathleen E. Cassidy

Kathleen E. Cassidy

cc: AUSA Camille Fletcher
U.S. Pretrial Services Officer Jonathan Lettieri

Request GRANTED.

Defendant's bail conditions are hereby modified from home detention to curfew with electronic monitoring subject to a schedule agreed to by Defendant's Pretrial Officer.

SO ORDERED.

10/2/2024

DATE


VICTOR MARRERO, U.S.D.J.